

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

In re UPSTREAM ADDICKS AND BARKER  
(TEXAS) FLOOD-CONTROL RESERVOIRS

THIS DOCUMENT APPLIES TO:

ALL UPSTREAM CASES

Sub-Master Docket No. 17-9001L

Judge Charles F. Lettow

**UPSTREAM PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINE**

On May 13, 2020, the government filed a Motion for a Protective Order Precluding Depositions under Plaintiffs' Rule 30(b)(6) Deposition Notice. ECF No. 291. Pursuant to RCFC 7.2(a)(1), Plaintiffs' response is due within 14 days after service of the motion.

For good cause, and not for purposes of delay, Plaintiffs respectfully request an extension of time until **Monday June 1, 2020** to file their response. Plaintiffs have conferred with the government's counsel, Ms. Kristine Tardiff, and the government is not opposed to the relief requested in this motion. Therefore, Plaintiffs ask that the Court grant their request to extend the deadline for filing their response to ECF No. 291 to Monday, June 1, 2020.

Dated: May 27, 2020.

Respectfully submitted,

/s/ Charles Irvine

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***Of Counsel for Upstream Plaintiffs***

**CERTIFICATE OF CONFERENCE**

The undersigned attorney hereby certifies that co-lead counsel conferred with Defendant via electronic mail on May 27, 2020. Defendant's counsel stated that the Defendant is not opposed to the relief requested in this Motion.

/s/ Charles Irvine  
Charles W. Irvine

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing instrument, together with all exhibits, was served on all counsel of record in this Sub-Master Cause by filing it via the Court's ECF system on May 27, 2020.

/s/ Daniel Charest  
Daniel Charest